



MASSACHUSETTS FARM BUREAU FEDERATION, INC.

"The Voice of Agriculture"

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To: MA Department of Energy Resources
From: MA Farm Bureau Federation
RE: SREC-II

I am writing on behalf of the Massachusetts Farm Bureau Federation (MFBF) to provide comment on the framework presented for the SREC-2 Policy Design. MFBF is a non-profit organization which represents the interests of farmers. We are the largest farming organization in Massachusetts representing more than 6,000 families.

We understand that DOER is considering addressing the issue of solar arrays on agricultural and forested land both in ongoing policy, and in upcoming SREC-2 regulations. We have concerns and suggestions on this approach:

Concerns

- Many farmers are viewing solar and wind installations as a good means of supplementing farm income in order to keep farms financially viable. Farming is a tenuous business subject to the influence by weather, pests and market fluctuation. Income is seasonal. Solar arrays offer a means by which farms can use a portion of their land to obtain a year-round and dependable income. In many cases, this predictable income allows them to farm the remainder of their land. Without this income, some would have no other choice but to sell or otherwise develop the land.
- We understand the impetus to keep prime agricultural soils available for farming. However, this is a long-term, rather than a short-term endeavor. Unlike other alternative uses for agricultural land, solar arrays are easily removed. Soil not removed from the site. Once arrays are removed, the land remains suitable for farming. Outside of a profitable agricultural use, *solar arrays may be the best alternative use for agricultural land available.*
- DOER staff has suggested that part of the reason for considering restriction on arrays on agricultural land, is due to concerns of the public about arrays being placed on open space. We would suggest that such issues are best addressed by local communities, where officials are more familiar with the factors involved. It is very difficult for a state agency to have enough knowledge of a local community to distinguish between NIMBYism and legitimate concerns. NIMBYism is a significant and ongoing issue with many agricultural activities, including sighting of solar arrays.
- Potential impacts on agricultural land are limited. Analysis suggests that even if 100% of the next 1200 MW were built on farm/wood lands, only about 1% of farm/wood land in Massachusetts would be used for solar.

- Treating agricultural and forested land differently than other properties would likely have a chilling effect on the market for farmers. Solar developers, understandably, will choose the path of least resistance in siting new arrays. Creating additional review or uncertainty, will dissuade many developers from considering agricultural or forested sites. For reasons stated above, this would be bad policy.

Suggestions

- Reconsider “managed supply” for farm/wood/open land owners and treat farm/wood/open land owners the same as other projects’ landowners
 - DOER’s plan already has a mechanism (the “Adjusted SREC Factor”) to slow development in an orderly way by slowly reducing incentives over the next seven years in a nondiscriminatory way
 - Incentives could be provided to encourage farmers to devote only a portion of their land to solar. Similarly, incentives could be provided where an installation can be shown to add to the overall financial viability of an existing farm.
- Handle transition from SREC-I to SREC-II in a more orderly and predictable fashion.
 - Expand SREC-I to include projects that can meet certain benchmarks by December 31, 2013, including:
 - Major Permits
 - Evidence of Site Control
 - Interconnection Service Agreement (ISA) with utility

We would welcome the opportunity to sit down with DOER prior to their writing the new regulations.

Thanks you for your consideration of our comments. Should you have any questions, please don’t hesitate to contact me.

Sincerely,

Brad Mitchell
Director of Government Affairs